

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA, )**

**Plaintiff, )**

**vs. )**

**STEFAN SEUSS, )**

**Defendant. )**

**CASE NUMBER: 09-CR-00683-JF-1**

**UNOPPOSED MOTION TO RECONSIDER AMOUNT OF FINE**

The Defendant, Stefan Seuss, through undersigned counsel, files this Unopposed Motion to Reconsider Amount of Fine and in support thereof states:

1. On April 14<sup>th</sup>, 2011, this court sentenced Mr. Seuss to credit for time served followed by two years of supervised release and a \$50,000 fine. Mr. Seuss respectfully requests this court to reconsider the amount of fine and set it at \$10,000 or less. Both parties jointly requested a fine at the low end of the guideline level which is \$10,000. Co-defendant Meyer who had a greater involvement in the instant offense received a \$500 fine.

2. Additionally, due to the stigma associated with the instant conviction, Mr. Seuss' business and income has been severely negatively affected. As noted in the Presentence Investigation Report, Mr. Seuss has an over \$6,000 negative net monthly cash flow.

3. Undersigned counsel has conferred with Assistant United States Attorney Suzanne B. Ercole who advised that the Government does not oppose the request for

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a fine at the low end of the sentencing guidelines.

WHEREFORE, based upon the above and foregoing, the Defendant, Stefan Seuss, respectfully requests that this Court grant the instant motion and set the fine at \$10,000 or less.

Respectfully submitted,

**ROBBINS, TUNKEY, ROSS, AMSEL,  
RABEN AND WAXMAN, P.A.**

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By: \_\_\_\_\_

ROBERT G. AMSEL  
FLORIDA BAR NO. 0349690

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was this 15th of April, 2011, forwarded to all counsel of record and all parties who are authorized to receive electronic Notices of Electronic Filing via CM/ETC.

**ROBBINS, TUNKEY, ROSS, AMSEL,  
RABEN & WAXMAN, P.A.**

ROBERT G. AMSEL  
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**ORDER AMENDING JUDGEMENT**

**AND NOW**, this \_\_\_\_ of April, 2011, upon consideration of the Defendant's Unopposed Motion to Reconsider Amount of Fine, it is hereby:

**ORDERED AND ADJUDGED** that the Judgement and Commitment Order in this matter be amended to reflect a fine amount of \$\_\_\_\_\_.

**BY THE COURT:**

\_\_\_\_\_  
HONORABLE JOHN P. FULLAM  
*Senior Judge, United States District Court*

Copy furnished to:  
All counsel of record